

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

SILICON GRAPHICS, INC.

x

Civ. Action No.

Plaintiff,

:

v.

:

ATI TECHNOLOGIES, INC.

:

Defendant.

:

x

**COMPLAINT FOR PATENT
INFRINGEMENT**

Plaintiff Silicon Graphics, Inc., for its complaint against defendant ATI Technologies, Inc., states as follows:

PARTIES

1. Plaintiff Silicon Graphics, Inc. ("SGI") is a Delaware corporation with its corporate offices in Mountain View, California and research and manufacturing facilities in Chippewa Falls, Wisconsin.

2. Defendant ATI Technologies, Inc. ("ATI") is a Canadian corporation formed under the Business Corporations Act (Ontario) with its principal and head office at Markham, Ontario, Canada.

JURISDICTION AND VENUE

3. This is an action for patent infringement over which this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over ATI. ATI has transacted business within this District and specifically performed acts of patent infringement in or directed to this District.

5. Venue properly lies within this District under 28 U.S.C. § 1331 and §1400(b). Defendant ATI has committed acts of patent infringement within this District, by promoting, selling and causing to be sold the accused products in this District.

6. On November 18, 2003, United States Patent No. 6,650,327 (“the ‘327 patent”) entitled “Display System Having Floating Point Rasterization and Floating Point Framebuffering” was duly and legally issued to inventors John M. Airey, Mark S. Peercy, Robert A. Drebin, John Montrym, David L. Dignam, Christopher J. Migdal and Danny D. Loh. SGI, by assignment from the inventors, is the owner of the ‘327 patent. Attached as Appendix A is a true and correct copy of the ‘327 patent.

7. Defendant ATI has, and continues to infringe the ‘327 patent by making, using, selling and offering to sell infringing ATI Radeon® products for use in desktop, laptop and server/workstation computing. ATI’s infringing conduct has caused SGI substantial damages, and, unless enjoined, will cause irreparable injury to SGI, its operations, reputation and good will.

8. SGI has provided legal notice to ATI of its infringing conduct. Notwithstanding this notice, ATI continues to infringe the ‘327 patent. ATI’s infringement is deliberate, willful and wanton, and will continue unless enjoined by this Court.

RELIEF REQUESTED

WHEREFORE, Plaintiff SGI requests that the Court enter a judgment in SGI's favor and against Defendant ATI, and provide SGI the following relief:

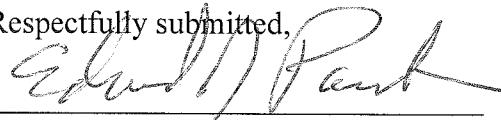
- A. Order, adjudge and decree that ATI has infringed the '327 patent in violation of 35 U.S.C. § 271;
- B. Issue permanent injunctive relief prohibiting ATI and its respective parents, subsidiaries, principals, officers, directors, agents, attorneys, employees and all others in privity with it from infringing the '327 patent, pursuant to 35 U.S.C. § 283;
- C. Award SGI its damages for patent infringement, and prejudgment interest and costs against ATI pursuant to 35 U.S.C. § 284;
- D. Order, adjudge and decree that ATI's infringement of the '327 patent has been deliberate, willful and wanton;
- E. Order, adjudge and decree that ATI's infringement of the '327 patent has been exceptional under 35 U.S.C. § 285;
- F. Trebling said damage award under 35 U.S.C. § 284;
- G. Award SGI its reasonable attorneys' fees under 35 U.S.C. § 285; and
- H. Award such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff SGI requests a trial by jury.

Dated: October 23, 2006

Respectfully submitted,



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